

REMARKS

Reconsideration of this application is respectfully requested. No amendments have been made, but a listing of the claims is included nonetheless for the convenience of the Examiner. Claims 65-75 remain pending.

Claim Rejections – 35 U.S.C. § 103

Claims 65-75 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over the Background section of the application ("Application Background") in view of U.S. Patent No. 6,748,484 to Henderson et al. ("Henderson"). Applicant respectfully disagrees with this reason for rejection.

As an initial matter, applicant denies that each and every statement set forth in the Application Background constitutes admitted prior-art. In particular, applicant's own insight into shortcomings of existing methods of prioritizing policy statements in a CAM (e.g., as set forth on page 5, at lines 22-24) and general statements as to the desirability of improving same (e.g., as set forth on page 6, at lines 6-8) do not themselves constitute prior art, but rather merely explain applicant's motivation for various embodiments of the invention disclosed in the ensuing detailed description. As discussed below, Henderson does not render claims 65-75 unpatentable even in view of the Application Background. Applicant nonetheless requests that any subsequent obviousness rejection, if deemed necessary, be made without reliance on applicant's own insight, or that legal authority for characterization of such as admitted prior-art be shown (c.f., MPEP § 2129).

Regarding Henderson, applicant notes that the application that issued into U.S. Patent No. 6,748,484 was filed after the present application, but claims priority to U.S. provisional application no. 60/148,403 (the "403 provisional"), which was filed roughly six weeks prior to the present application. Thus, applicant submits that the relevant disclosure for purposes of section 103 obviousness analysis is that of the '403 provisional (copy attached) and not U.S. Patent No. 6,748,484.

Applicant respectfully submits that, even if information in the Application Background could be combined with the '403 provisional, the combination would still lack one or more limitations in each of claims 65-75.

For example, claim 65 recites a method of adding a new policy statement to a plurality of policy statements stored in a first memory, the method including, in part:

comparing a new priority number associated with the new policy statement to a plurality of priority numbers stored in a second memory, the plurality of priority numbers each associated with a respective one of the plurality of policy statements stored in the first memory

The '403 provisional discloses storing a match weight as part of a CAM word so that, when multiple matches occur in the CAM, the best match can be determined by an arithmetic or logical

comparison of match weights of all matching CAM entries ('403 provisional, page 1). Thus, the '403 provisional is directed to using match weights to resolve priorities in a multiple match condition. The '403 provisional does not disclose or suggest any technique for adding a policy statement to a plurality of policy statements stored in a first memory, much less the above-recited limitation of comparing a new priority number associated with the new policy statement to a plurality of priority numbers stored in a second memory.

Accordingly, even if the disclosure of the '403 provisional could be combined with information in the Application Background, the combination would still lack at least the above-recited limitation and therefore would not have rendered claim 65 obvious.

Because claims 66 and 67 depend from and further limit claim 65, claims 66 and 67 also would not have been obvious in view of such combination.

Claim 68 recites in part:

comparing the altered new priority number to a plurality of priority numbers stored in a second memory, the plurality of priority numbers each associated with a respective one of the plurality of policy statements stored in the first memory

Applicant submits that, at least for the reasons given in reference to claim 65, a combination of the '403 provisional and the Application Background would lack at least the above-recited limitation and therefore would not have rendered claim 68 obvious.

Because claims 69-72 depend from and further limit claim 68, claims 69-72 also would not have been obvious in view of such combination.

Claim 73 recites a method of deleting a policy statement from a plurality of policy statements stored in a first memory, the method including, in part:

comparing a priority number associated with the policy statement to a plurality of priority numbers stored in a second memory, the plurality of priority numbers each associated with a respective one of the plurality of policy statements stored in the first memory

The '403 provisional does not disclose or suggest any technique for deleting a policy statement from a plurality of policy statements stored in a first memory, much less the above-recited limitation of comparing a priority number associated with the policy statement to a plurality of priority numbers stored in a second memory. Accordingly, even if the disclosure of the '403 provisional could be combined with information in the Application Background, the combination would still lack at least the above-recited limitation and therefore would not have rendered claim 73 obvious.

Because claims 74 and 75 depend from and further limit claim 73, claims 74 and 75 also would

not have been obvious in view of such combination.

Conclusion

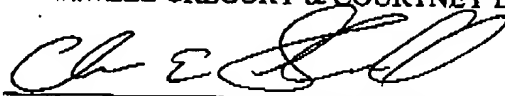
Applicant respectfully submits that claims 65-75 are in condition for allowance. If a telephone interview would be helpful in any way, the examiner is invited to call the undersigned attorney.

A Petition for a two (2) month extension of time is enclosed herewith.

Authorization is hereby given to charge deposit account 501914 for any fee deficiency associated with this Response.

Respectfully submitted,

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